

Amcom Communications Corporation
dba VONTASTIC

November 24, 2005

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Marlene H. Dortch
Executive Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**RE: 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letter of
Amcom Communications Corporation dba Vontastic
WC Docket No. 05-196**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 9.5(f) and to the November 7, 2005 Public Notice in the above referenced proceeding, Amcom Communications Corporation respectfully submits this Compliance Letter. Please refer any questions or correspondence regarding the report to me at the address below.

Sincerely,

/s/

Jamsheed Amirie
President & CEO
Amcom Communications Corporation
800-935-6020 X111
jayme@amcomtel.com

cc via email to:
Kathy Berthot
Janice Myles
BCPI

2005 Interconnected Voice Over Internet Protocol 911 Compliance Letter
WC Docket No. 05-196
Amcom Communications Corporation dba Vontastic
November 24, 2005

After much consideration, Amcom chose Intrado as its 911 service provider. This choice was primarily driven by the breadth of Intrado's experience and 911 coverage.

1) 911 Solution:

This description should include a quantification, on a percentage basis, of the number of subscribers to whom the provider is able to provide 911 service in compliance with the rules established in the VoIP 911 Order:

Through data synchronization and call delivery with Intrado, Amcom is able to deliver basic 911 services to 100% of its VOIP (Vontastic) customers and E911 services in all areas where it is 1) technically feasible to do so and 2) Intrado has coverage, comprising over 90% of Amcom customers.

The V9-1-1™ solution enabled by Intrado provides a true E9-1-1 solution for Amcom. Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for Amcom is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Intrado manages the VPC functionality and the Call delivery component on behalf of Amcom thereby enabling a full end-to-end solution from one service provider.

The only Amcom requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Intrado via a real-time interface and the connectivity to the Intrado network to enable live 9-1-1 call delivery.

1a) 911 Routing Information/Connectivity to Wireline E911 Network:

A detailed statement as to whether the provider is transmitting, as specified in Paragraph 42 of the VoIP 911 Order, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized." If the provider is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include a detailed explanation why not. In addition, the provider should quantify the number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005.

Currently through Intrado, Amcom will have access to 154 E9-1-1 Selective Routers by November 28th, 2005 and through Intrado will be routing all 911 calls in compliance with the VOIP 911 order where Intrado has coverage. The attached Major Market Rollout Map and the VoIP Deployment Plan reflects the major market deployment schedules.

Note: the market deployment map represent major markets where Intrado has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.

1b) Transmission of ANI and Registered Location Information:

A detailed statement as to whether the provider is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if the provider is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.

Through Intrado, in the event of a 911 call, Amcom will transmit the 911 callers' ANI and Location info to all answering points that are capable of receiving this information and are accessed by Intrado.

i) There are 2,211 answering points in the States in which Amcom currently sells Vontastic service. All of them are accessed by Intrado. Of these 584 are voice-only PSAP's in NJ; therefore 73.6% of PSAP's in Amcom's service area are E911 capable.

ii) Amcom will transmit every (100%) 911 call with ANI and Location information to answering points that are E911 capable and Intrado has coverage.

iii) N/A

- **Basic PSAP:** Currently 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router. To illustrate PSAPs within the US, which are not served by a Selective Router, the enclosed "Basic PSAP" map could be used as reference information. **While these areas are not included within the FCC Order and are not required for compliance,** Intrado is actively contacting these areas to determine technical options for VoIP E9-1-1 native call delivery.
- **ANI Only:** There are unique deployment circumstances in areas of the US and Puerto Rico that operate off E9-1-1 Selective Routers, but will not meet the full FCC mandate. Intrado is currently aware of four (4) States and a Territory that will have native Selective Routing functionality but will only provide Automatic Number Identification (ANI) only service to the PSAP. The following information explains the circumstances within these areas:

New Jersey - In the State of New Jersey Intrado has gained permission from the State to deploy a voice only service which includes the call taker receiving ANI on the VoIP 911 caller. The State ALI system is not capable of full dynamic ALI updates and will require an upgrade. New Jersey represents 3% of the total US population.

Ohio - To date, Ohio has not granted permission to Intrado to deploy a voice only solution. The State ALI system is not capable of full dynamic ALI update. Ohio represents 4% of the total US population.

Hawaii - To date, Hawaii has not granted permission to Intrado to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update. Hawaii represents 5% of the total US population.

Puerto Rico - To date, Puerto Rico has not granted permission to Intrado to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update. Puerto Rico represents 3% of the total US population.

1c) 911 Coverage:

To the extent a provider has not achieved full 911 compliance with the requirements of the VoIP 911 Order in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.

Deployment Overview – Intrado is working on nationwide native VoIP E9-1-1 delivery in accordance with the Commission Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on customer subscriber base priorities. The attached “Major Market Deployment Map”, which corresponds with MSAs, identifies regions within the US that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. These areas are planned for deployments by November 28, 2005; March 31, 2006 and June 30, 2006.

2) Obtaining Initial Registered Location Information:

A detailed description of all actions the provider has taken to obtain each existing subscriber’s current Registered Location and each new subscriber’s initial Registered Location. This information should include, but is not limited to, relevant dates and methods of contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the provider has obtained the Registered Location.

Each customer at the point of sale for Vontastic services provides the physical address where the CPE/TA will be put into service. Orders for service are not taken without this information. Amcom refers to this address as their “911 Service Address” and it can be wholly different than their billing, shipping or mailing addresses. The 911 Service Address is instantly transmitted via a real-time provisioning interface to Intrado’s Validation and Update Interface (VUI). The VUI includes a geocoding process as well as management of Master Street Address Guide (MSAG) validation.

At the time of a VoIP 9-1-1 call, Intrado uses the customer’s provisioned information to associate the latitude and longitude assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid address and Call Back Number of the user.

Amcom has the 911 Service Address for 100% of its VOIP (Vontastic) customers.

3) Obtaining Updated Registered Location Information:

A detailed description of the method(s) the provider has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the provider is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.

Amcom provides 2 ways for a customer to update their 911 Service Address. The first is by calling Vontastic Customer Service and asking a service agent to change it. The second is by accessing the CUSTOMER LOGIN area of the Vontastic website at www.vontastic.com where a prominent button is located titled “CHANGE MY 911 SERVICE ADDRESS” and the customer can update this information without any help from a service agent.

In the event the customer is calling to change their 911 service, they can be using the same equipment that they use to access Vontastic service to place the call.

4) Technical Solution for Nomadic Subscribers:

A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.

Implemented with Intrado:

Utilizing Intrado's V9-1-1™ Mobility Services, Amcom is able to route VoIP emergency calls from its VoIP network to the Intrado Network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 9-1-1 infrastructure. The Services utilized provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V9-1-1 solution enables full support of nomadic usage of VoIP provided the user updates their address information upon arrival into a new location. Through the Validation and Update Interface (VUI) the V9-1-1 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly provisioned address and make available (assuming no errors) that user's information for delivery to the PSAP within 15 minutes of receipt.

Intrado recognizes the need for removing the user interaction and self provisioning component of the solution. To that end, Intrado is actively working and trialing a number of location determination technologies, which will be supported by Intrado and the Intrado provisioning interface.

Implementing in Amcom VOIP network:

We are in the process of implementing IP-Block / IP-Geocoded databases within our VOIP network. When a customer first uses their Vontastic service, we will cross reference the geocoded location of the IP used by the CPE/TA to contact our network with the 911 Service Address provided by the customer at the point of sale.

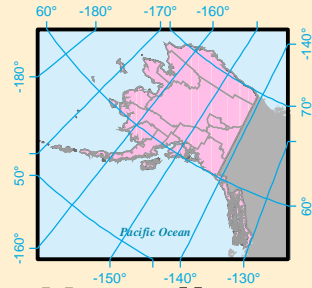
If the locations do not appear to be a match, we will assume the customer has installed the CPE/TA in a location other than the 911 Service address they provided at the point of sale and we will generate an email to the customer and an automated call to the CPE/TA informing the customer of the mismatch. If the locations appear to be a match, we will store that geocoded location information for that customer.

On every call attempt, we will query the aforementioned databases and compare the results to the geocoded location on file for that customer. If the information has changed, we will generate an email to the customer and an automated call to the CPE/TA informing the customer that we believe they have moved their equipment and must therefore contact Vontastic either through a call to Customer Service or via Web Interface at www.vontastic.com and update their 911 Service Address.

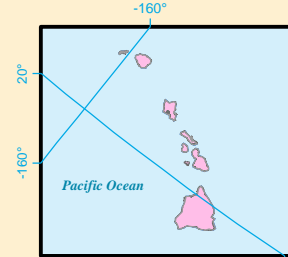
Note: the IP-Block / Geocoded databases are not guaranteed to be 100% accurate and as such we may 1) contact customers notifying them that we think they have moved or are nomadic and in fact they have not or are not or 2) not recognize customers who have moved or are nomadic.

This is a "best-efforts" process. We can not and will not guarantee that this process will be 100% accurate. However, we feel it is a valuable "extra-step" in handling the nomadic nature of VOIP relative to public safety and have every expectation that as issues like 911 and public safety expand in the VOIP world, this information may become more accurate and further solutions may become available.

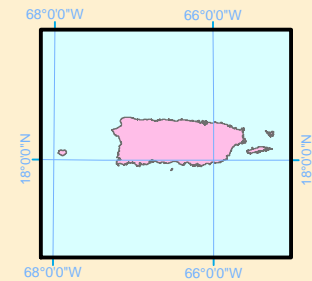
Alaska



Hawaii



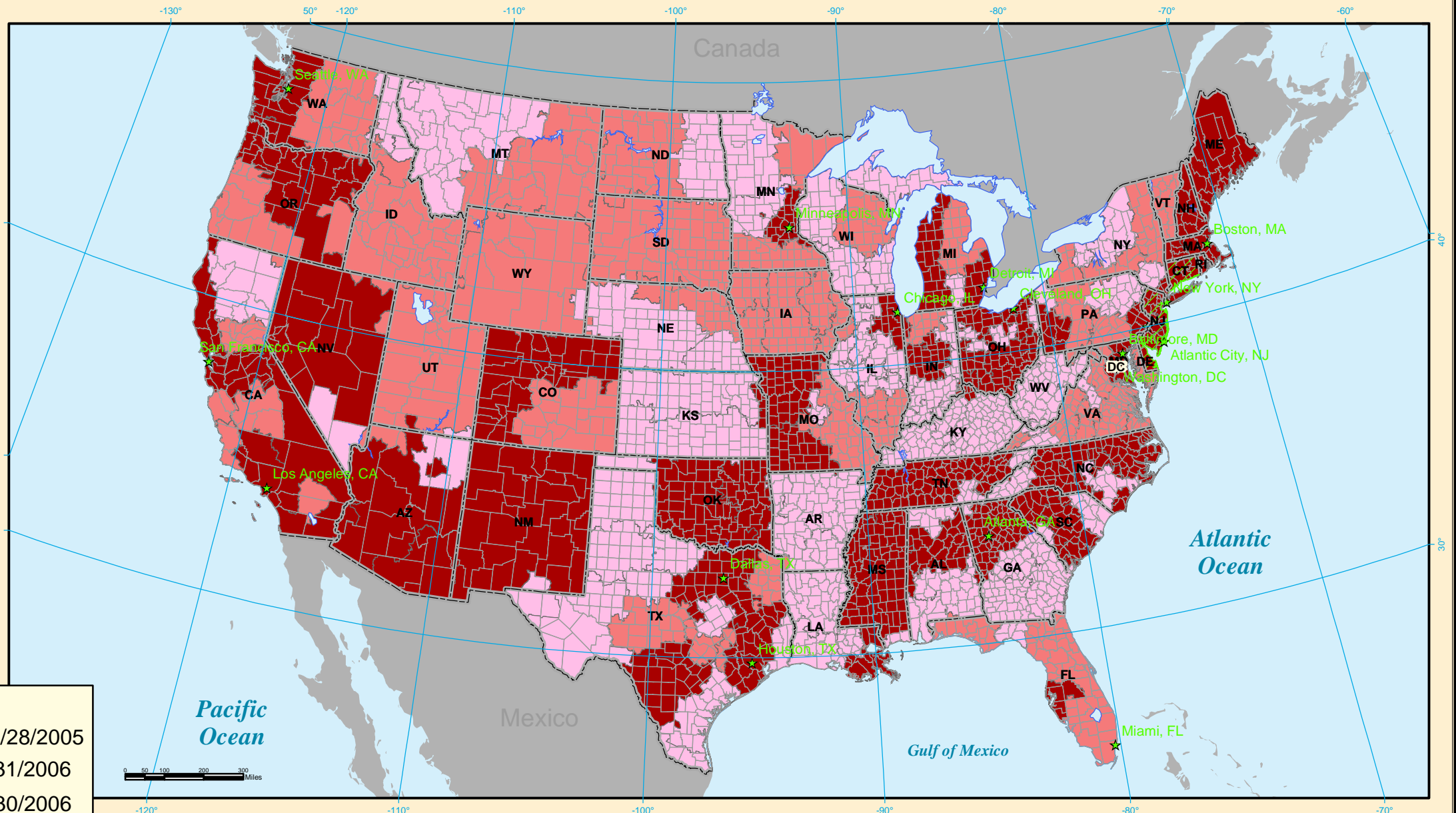
Puerto Rico



Legend

- Planned for 11/28/2005
- Planned for 3/31/2006
- Planned for 6/30/2006
- County Boundary
- or

 Top 20 MSAs
- Lakes



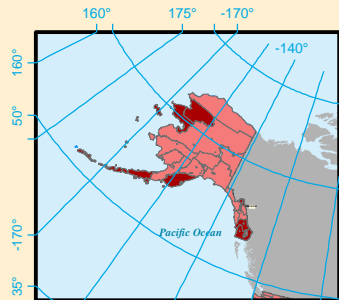
Intrado Major Market Rollout Schedule

Albers Projection
Central Meridian: -96
1st Std Parallel: 20
2nd Std Parallel: 40
Latitude of Origin: 40

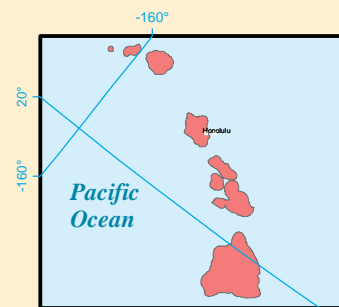
Intrado™
Informed Response.™

Intrado
WOS GIS Operations Team
Date: November 2005
Data Source: Meridian, Geode, IPS, ESRI Data
Created in ArcGIS 8 using ArcMap

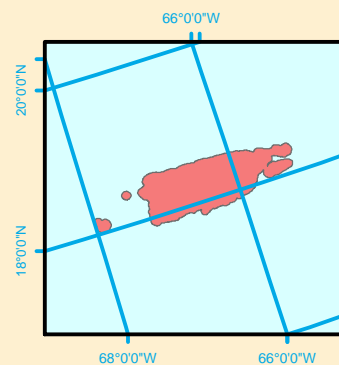
Alaska



Hawaii

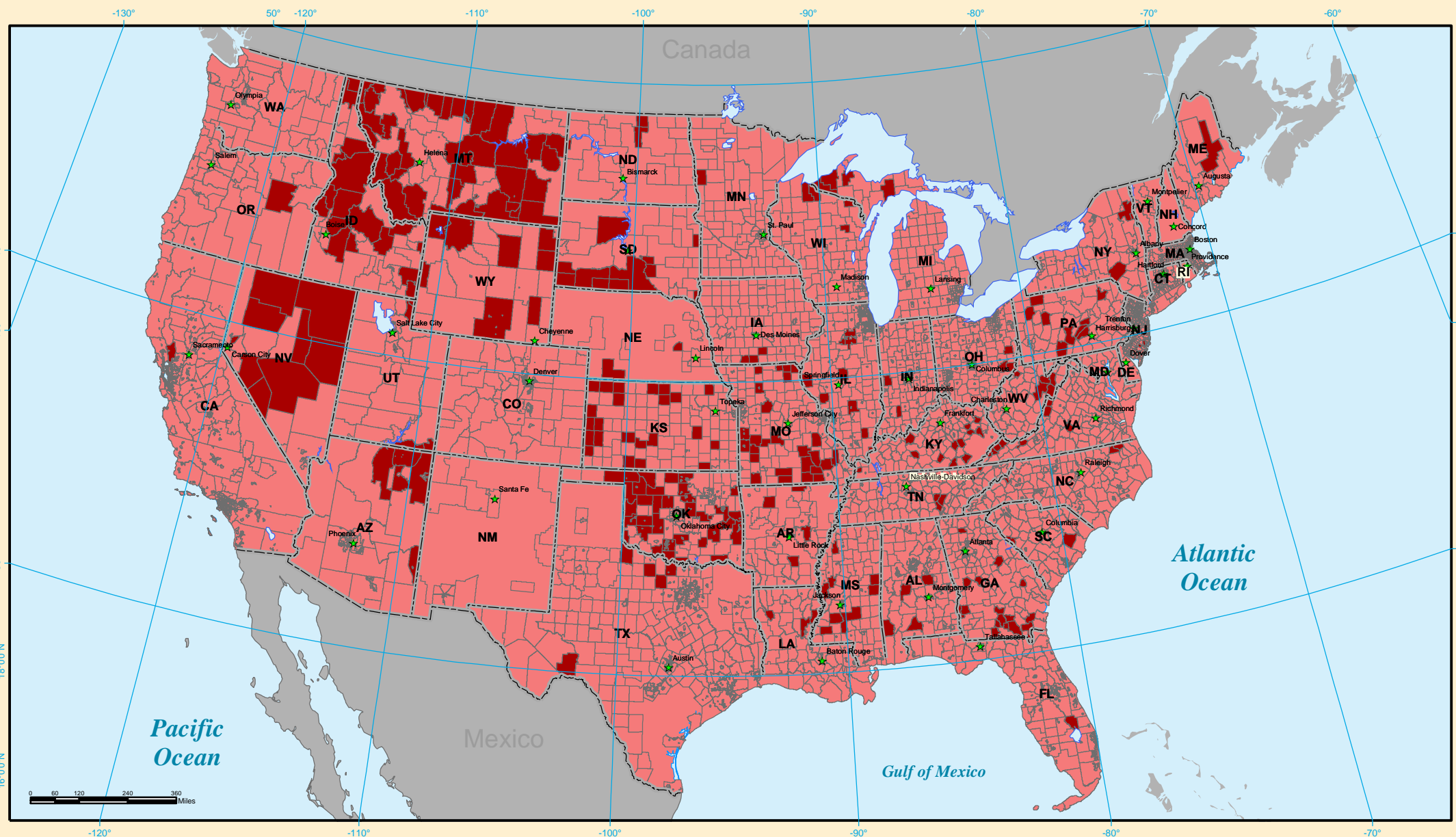


Puerto Rico



Legend

- Basic PSAPs
- Other PSAPs
- Capital Cities
- Lakes



Basic PSAPs

Albers Projection

Central Meridian: -96
1st Std Parallel: 20
2nd Std Parallel: 60
Latitude of Origin: 40

Intrado

Intrado

WOS GIS Operations

November 2005

Data Source: Geode, Meridian, ESRI Data

Created in ArcGIS 8 using ArcMap